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March 25, 2021

Via ECF and Facsimile (212-805-7942)

So ordered,

Hon. Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
U.S. Courthouse  
500 Pearl Street, Room 1050  
New York, New York 10007

/s/ Hon. Alvin K. Hellerstein  
March 25, 2021

Re: Merlene Dayan and Estate of Raymond Dayan v. Leonora Sutton, et al.  
SDNY Case No. 20-cv-9563 (AKH)

Dear Judge Hellerstein:

This law firm represents defendants Middlegate Securities Ltd., Albert Sutton and Elias Sutton a/k/a Elliot Sutton (collectively, the “Middlegate Defendants”) in the above-referenced action.

We are writing to request that the Court extend the Middlegate Defendants’ time to respond to the First Amended Complaint filed by plaintiffs Merlene Dayan and Estate of Raymond Dayan (“Plaintiffs”) to and including April 29, 2021. This is the first request to extend the Middlegate Defendants’ time to respond to the First Amended Complaint, which is currently due on March 29, 2021. Plaintiffs’ counsel, Gabriel Fischbarg, Esq., consents to this first request for an extension. The requested extension does not affect any other scheduled dates in this action.

Accordingly, we respectfully request that the Court “so-order” this letter and e-file same on ECF to confirm the new date for the Middlegate Defendants’ response to the First Amended Complaint.

Respectfully submitted,

*Jason L. Libou*

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Cc: Gabriel Fischbarg, Esq. (via ECF)  
Evan Weintraub, Esq. (via ECF)